



U.S. Department of Justice

Antitrust Division

*Liberty Square Building
450 5th Street, N.W.
Washington, DC 20001*

June 22, 2018

VIA ELECTRONIC TRANSMISSION

Honorable Tonianne Bongiovanni, U.S.M.J
US District Court for the District of New Jersey
402 East State Street
Trenton, New Jersey 08608

Re: Heritage Pharmaceuticals, Inc. v. Jeffrey Glazer and Jason Malek,
Case No. 3:16-cv-08483 (PGS)(TJB)

Dear Judge Bongiovanni:

I write on behalf of the United States, an intervenor in this matter, and with the consent of all parties. Currently pending before Your Honor are Motions to Disqualify submitted by both Defendant Jeffrey Glazer and Defendant Jason Malek. At the request of the United States, these motions, as well as oppositions and replies, have been filed under seal. Under the terms of Local Rule of Civil Procedure 5.3(c), a consolidated Motion to Seal these materials must be filed by June 25, 2018.

The United States is currently conferring with Plaintiff and Defendants as to which portions of the motions, oppositions, and replies need to remain under seal. The United States also understands that Plaintiff Heritage is considering filing a Motion for Leave to File a Sur-Reply to Defendant Malek's reply brief. In order to allow time for these discussions and the preparation of a single consolidated motion to seal, the Parties request an extension of the deadline to file a consolidated motion to seal until July 16, 2018.

If the Parties' agreement on this issue is acceptable to Your Honor, we respectfully request that Your Honor so order this letter and have it entered on the docket.

Thank Your Honor for your consideration, and should Your Honor or Your Honor's staff have any questions, we are always available.

Respectfully Submitted,

s/ Jay D. Owen

Jay D. Owen

cc: All Counsel of Record (via email)

SO ORDERED, this 22 day of June, 2018

A handwritten signature in black ink, reading "Torianne J. Bongiovanni". The signature is written in a cursive style with a large, stylized initial "T".

Honorable Torianne Bongiovanni, U.S.M.J.